

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Jessica Lynn Sibilias	:	Case No.: 25-10113-pmm
428 Militia Drive	:	
Lansdale, PA 19446	:	
	:	Chapter 13
	:	
Plaintiff/Debtor	:	
	:	
Beyond Finance, LLC	:	Adversary No.:
7322 Southwest Freeway	:	
Suite 1200	:	
Houston, TX 77074	:	
	:	
Defendant	:	

**COMPLAINT TO RECOVER MONEY HELD BY  
BEYOND FINANCE, LLC ON BEHALF OF DEBTOR**

**PRELIMINARY STATEMENT**

This is an action by the debtor, Jessica Lynn Sibilias, to recover \$4,238.75 held by Beyond Finance, LLC on behalf of Debtor.

**PARTIES**

1. Plaintiff is the debtor, Jessica Lynn Sibilias; she resides at the captioned address.
2. Plaintiff filed her voluntary petition on January 10, 2025.
3. Defendant is Beyond Finance, LLC which has registered its address with the Pennsylvania Department of State at 7322 Southwest Freeway, Suite 1200, Houston, TX 77074; Defendant lists its corporate address on its website as 1401 Enclave Parkway, Suite 200, Houston, TX 77077.

**JURISDICTION AND VENUE**

4. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334.

5. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2)(E).
6. Venue is proper in this district pursuant to 28 U.S.C. §1409(a).

### **FACTUAL ALLEGATIONS**

7. Defendant is a debt negotiator which periodically was receiving money from the Debtor and attempting to negotiate settlements with creditors on behalf of the Debtor.
8. The Debtor thereafter chose to file this Chapter 7 proceeding.
9. The Defendant held, on the date of filing and continues to hold, \$4,283.75 in its escrow account on behalf of Debtor. See Exhibit A attached hereto.
10. This is property of the bankruptcy estate pursuant to 11 U.S.C. §541.
11. Per 11 U.S.C. 522(d)(5), the \$4,283.75 was claimed and allowed as exempt; see Debtor's Schedule C.
12. Despite demand by the Plaintiff, Defendant has refused to turnover \$4,283.75.
13. Plaintiff seeks an order of the Court directing Defendant, Beyond Finance, LLC to turnover the \$4,283.75 pursuant to 11 U.S.C. §542.

**WHEREFORE**, Plaintiff, Jessica Lynn Sibilia, seeks judgment as follows:

- a) An order directing Defendant to turnover \$4,283.75 to the Plaintiff;
- b) For such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ William D. Schroeder, Jr.  
William D. Schroeder, Jr.  
Attorney for Plaintiff – Debtor

March 18, 2025